

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF MICHIGAN

IN RE:

JERRY LEE PIPER
AKA JERRY PIPER

HONORABLE JOHN T. GREGG
CASE NO. 20-00028-JTG
CHAPTER 13

DEBTOR.

JERRY LEE PIPER
AKA JERRY PIPER
Debtor in Pro Se
4598 Pinefield Ave.
Portage, MI 49024

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OBJECTION TO CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN

Santander Consumer USA Inc. dba Chrysler Capital ("Creditor"), for its Objection to Confirmation of Debtor's Chapter 13 Plan, states as follows:

1. The Creditor has perfected its security interest in the 2016 Chevrolet Trax bearing vehicle identification number 3GNCJLSB7GL186666.
2. The gross outstanding indebtedness owing to the Creditor under the terms of the Retail Installment Sales Contract at the time of filing of the Bankruptcy was \$10,101.68.
3. The Plan states a value of \$7,815.00 with pro rata monthly payments, to be paid with interest at 8%.

4. This vehicle was purchased within 910 days prior to the petition date. Therefore, Santander Consumer USA Inc. dba Chrysler Capital is entitled to its full outstanding balance pursuant to 11 U.S.C. § 1325(a)(9).

5. The Creditor requests proof of full-coverage insurance.

6. The Plan fails to provide for equal monthly payments beginning from confirmation as required by 11 U.S.C. § 1325(a)(5)(B)(iii).

7. The Plan fails to provide that the Creditor retain its lien on the subject vehicle as required under 11 U.S.C. § 1325(a)(5)(B)(i).

In conclusion, the Creditor requests that this Court grant the relief requested and not confirm the Chapter 13 Plan until these Objections are resolved.

O'REILLY RANCILIO P.C.

/s/ *Craig S. Schoenherr, Sr.*

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